ERIC GRANT 1 Acting United States Attorney MATHEW W. PILE, WSBN 32245 2 Head of Program Litigation 1 3 Social Security Administration MARLA K. LETELLIER, CA 234969 4 Special Assistant United States Attorney 6401 Security Boulevard 5 Baltimore, Maryland 21235 6 Telephone: (510) 970-4814 E-Mail: Marla.Letellier@ssa.gov 7 8 Attorneys for Defendant UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 Case No.: 2:25-cv-01784-TLN-AC DERION L. OLIVER, 12 STIPULATION AND [PROPOSED] ORDER Plaintiff, FOR AN EXTENSION OF TIME 13 VS. 14 COMMISSIONER OF SOCIAL SECURITY, 15 16 Defendant. 17 18 19 20 21

Pending the Court's approval, the time for Defendant to file her Motion for Summary Judgment is extended thirty-five (44) days from December 3, 2025, up to and including January 16, 2026. This is the Defendant's first request for an extension on the deadline to file his Motion for Summary Judgment.

After being recently assigned this case, Counsel for Defendant respectfully requests this extension in order to adequately evaluate the issues presented. Counsel requests a 44-day extension due to the large backlog of work created by the extended lapse in appropriations as well as planned leave during the holidays. Defendant appreciates Plaintiff's counsel's professional courtesy and apologizes to the Court for the inconvenience.

Accordingly, the parties hereby stipulate that Defendant's Motion for Summary

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1	Judgment be due on January 16, 2026. The parties further stipulate that the Court's Scheduling	
2	Order shall be modified accordingly.	
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4		Respectfully submitted,
5	Dated: December 2, 2025	ERIC GRANT
6		United States Attorney
7	By	/s/ Marla K. Letellier
8	Бу	MARLA K. LETELLIER Special Assistant U.S. Attorney
10		Attorneys for Defendant
11	Dated: December 2, 2025	SACKETT AND ASSOCIATES
12	By	/s/ Steven Rosales*
13		(*as authorized via e-mail on December 2, 2025) HARVEY P. SACKETT
14		Attorney for Plaintiff
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20	<u>ORDER</u>	
21	Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an	
22	extension, up to and including January 16, 2026, to file his Motion for Summary Judgment.	
23	DATED: December 3, 2025	
24		auson Clane
25		ALLISON CLAIRE UNITED STATES MAGISTRATE JUDGE
26		OTTIED STATES MASISTRATE TODGE
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